

FOR THE SOUTHERN DISTRICT OF NEW YORK
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TAMIKO GARRIS-RIVERS,

Index No. 13-cv-9034(GBD)(RLE)

Plaintiff,

-against-

NOTICE OF MOTION

THE METROPOLITAN TRANSPORTATION
AUTHORITY, THE METROPOLITAN
TRANSPORTATION AUTHORITY POLICE
DEPARTMENT, THE LONG ISLAND RAIL ROAD,
MTAPD POLICE OFFICER ELOISE BRODERICK,
MTAPD POLICE OFFICER GREG BUEHLER, MTAPD
POLICE OFFICER CHRIS MCDERMOTT, MTAPD
POLICE OFFICER JOUAN OLIVARES, MTAPD
POLICE OFFICER ROBERT RAU, MTAPD POLICE
OFFICER MATTHEW REILLY, MTAPD POLICE
OFFICER MICHAEL HAGGERTY, MTAPD POLICE
OFFICER SHEK, MTAPD POLICE OFFICER "JOHN
DOE" ALSO KNOWN AS POLICE OFFICER "WILLETT",
LIRR EMPLOYEE BENJAMIN GARDNER, and
LIRR EMPLOYEE JOHN MANCINI,

Defendants.

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S I R S :

PLEASE TAKE NOTICE that, upon the Memorandum of Law, the Statement of Material Facts Pursuant to Local Civil Rule 56.1, the Declaration of Andrew K. Preston and all exhibits annexed thereto, the Defendants will move this Court for an order, pursuant to *Rule 56* of the *Federal Rules of Civil Procedure*, granting summary judgment in favor of the Defendants on the grounds that there are no genuine issues of material fact to be tried, and dismissing Plaintiff's complaint against the Defendants in its entirety, with prejudice, and for any such other and further relief as the Court deems just and proper.

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